

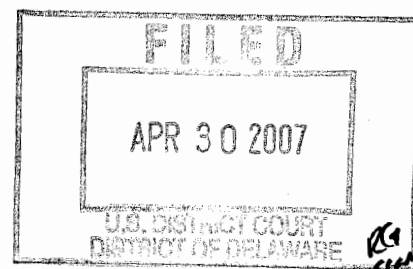
IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF DELAWARE

Michael Lee Rose  
Plaintiff

Civil Action no. 06-370-JJF

v.

First Correctional  
Medical Correctional Medical Services  
Dr. Niaz  
Defendants



PLAINTIFF'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff here by requests that Defendants produce for inspection and copying the documents and tangible things identified below within thirty (30) calendar days of the service of this document request.

1. All written statements, originals or copies of the incidents on August 15 - 18, 2003; and two more incidents in September, 2005; relating to health and hospital matters.
2. Any and all medical records of the Plaintiff from the time of his incarceration in gander Hill and Delaware Correctional Center through and including the date of your response to this request.
3. Any and all rules, regulations, and policies of the Delaware Correctional Center policies for the treatment of Hepatitis C.

Date Submitted: 4/25/07

Respectfully Submitted

*Michael Lee Rose*

Michael Lee Rose  
SBI#  
1181 Paddock Road  
Smyrna, DE 19977

## Certificate of Service

I, Michael Lee Rose, hereby certify that I have served a true

And correct cop(ies) of the attached: Motion for Productions of Documents

\_\_\_\_\_ upon the following  
parties/person (s):

TO: United States District Court for the

District of Delaware

844 North King St., Lockbox 18

Wilmington, DE 19801-3570

TO: Dana Spring Monzo Daniel L. McKenty

McCullough & McKenty P.A.

1225 N. King St, Suite 100, P.O. Box 397

Wilmington, DE 19899-0397

TO: Kevin Connors, Lorenza A. Wolhar, Marshall

Dennehey, Warner, Coleman Goggin

1220 N. Market St., 5th Flr., P.O. Box 8888

Wilmington, DE 19899-8888

TO: Lorenza A. Wolhar Marshall, Dennehey,

Warner, Coleman & Goggin

1220 North Market St., 5th Flr., P.O. Box  
8888

Wilmington, DE 19899-8888

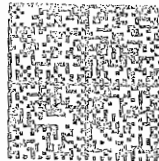
BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 25 day of April, 2007

Michael Lee Rose

IM Michael Lee Rose  
SBI# 091780 UNIT T.2-38  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977

U.S.M.S.  
X-RAY



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Office of the Clerk

United States District Court

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